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Attorneys for Defendant Imperial Pacific International (CNMI), LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

ÖZCAN GENÇ, HASAN GÖKÇE, and
SÜLEYMAN KÖŞ, on behalf of themselves
and all other persons similarly situated,

Plaintiffs,

vs.

IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC, and IMPERIAL PACIFIC
INTERNATIONAL HOLDINGS LTD.

Defendants.

Civil Case No. 1:22-cv-00002

**DEFENDANT IMPERIAL PACIFIC
INTERNATIONAL (CNMI), LLC'S
MOTION FOR ATTORNEYS TO APPEAR
BY VIDEO-TELECONFERENCE**

Hearings: September 14, 2022 / Times: 9:00
A.M., 9:30 A.M.

1 Defendant Imperial Pacific International (CNMI), LLC (“IPI” or “Defendant”), by and
2 through its undersigned counsel hereby requests the Court to permit counsel Daniel H. Weiner,
3 Amina Hassan and Eleanor Erney to appear by video-teleconference at (1) the Hearing on San
4 Nicolas Law Office’s Motion to Withdraw as Counsel to IPI (ECF No. 25), scheduled for
5 September 14, 2022 at 9:00 a.m. (ChST), and (2) the Hearing on Defendant’s Motion to Dismiss
6 the First Amended Complaint (ECF No. 24), scheduled for September 14, 2022 at 9:30 a.m.
7 (ChST) (the “Hearings”). Defendant makes this request for the following reasons:

8 1. Under the Local Rules, it is in the Court’s discretion to permit an attorney, who does not
9 reside in Saipan, to appear remotely for conferences and arguments on motions. *See* Local Rule
10 83.4(b). Remote conferencing is “encouraged when that practice will save the attorneys, parties, or
11 court time and money.” *Id.*

12 2. Mr. Weiner, Ms. Hassan and Ms. Erney do not reside in the Commonwealth of the Northern
13 Mariana Islands (“CNMI”). Mr. Weiner and Ms. Hassan reside and work in New York City, New
14 York, and Ms. Erney resides and works in Washington, D.C. Travel times to CNMI exceed 24
15 hours from either New York or Washington. Permitting Mr. Weiner, Ms. Hassan and Ms. Erney to
16 appear remotely at the Hearing will be cost- and time-efficient.

17 3. In addition, while COVID-related travel restrictions have significantly reduced in Saipan,
18 New York and Washington, permitting Defendant’s U.S.-based attorneys to appear for the Hearing
19 remotely will also avoid the risks of exposure during long air-travel.

20 4. Finally, Mr. Weiner, Ms. Hassan and Ms. Erney’s appearance by video-teleconference will
21 not prejudice Plaintiffs.
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1 Dated: September 7, 2022

Respectfully submitted,

2 /s/ Amina Hassan

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4 Daniel H. Weiner (*Pro Hac Vice*)
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13 *Attorneys for Defendant Imperial Pacific*
14 *International (CNMI), LLC*

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CERTIFICATE OF SERVICE

I hereby certify that, on September 8, 2022 (CHST), I electronically filed the foregoing
with the Clerk of Court for the United States District Court for the Northern Mariana Islands

1 using the CM/ECF system. A true and correct copy of this motion has been served via the
2 Court's CM/ECF system on all counsel of record.

3 /s/ Amina Hassan
4 Amina Hassan
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